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2008 AUG 25 PM 3:39

CLERK US DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY Rm DEPUTY

1 Nathan Kevin Turner  
2 C-44886 - J-264L  
Post Office Box 2000  
3 Vacaville, CA 95696-2000

Plaintiff In Pro. Se

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

10 Nathan Kevin Turner )  
11 Plaintiff, )  
12 v. )  
13 Bonnie Dumanis, District Attorney of )  
the County of San Diego; San Diego )  
14 Police Dept.; Detective A. Fragoso of )  
the San Diego County Police Dept.; )  
15 Detective J. Dreis of the San Diego )  
County Police Dept.; San Digo Crime )  
16 Lab; and the Attorney General of )  
the State of Calif., )  
17 Defendants. )  
18 \_\_\_\_\_ )

Civil No. 08-cv-00360 W (RBB)

REQUEST FOR A 60-DAY ENLARGEMENT  
OF TIME TO FILE THE ANSWER TO  
NOTICE TO MOTION AND MOTION TO  
DISMISS PLAINTIFF'S COMPLAINT  
FOR FAILURE TO STATE A  
CONSTITUTIONAL CLAIM  
[doc.no.10]; [doc.no.12]; [doc.  
no.13]; and [doc.no.15].

Date : July 28, 2008  
Dept. : 7-Courtroom of the  
Honorable Thomas Whelan  
Trial Date : None

19 PLEASE TAKE NOTICE that on July 28, 2008 or as soon thereafter as the matter  
20 may be heard, in the courtroom of the Honorable Thomas Whelan, United States  
21 District Judge, located at 940 Front Street, San Diego, California, Plaintiff  
22 Nathan Kevin Turner, a State prisoner proceeding in Pro. Se, on July 10, 2008,  
23 filed a Request for a 60-day enlargement of time to respond to answer to  
24 Attorney General and District Attorney Bonnie Dumanis, et al., [doc.no.10]; [doc.  
25 no.12], was set to be heard by the court on June 23, 2008, at 10:00 a.m.  
26 Defendants San Diego Police Dept., J. Dreis, [doc.no.12] on June 23, 2008 set  
27 to be heard by judge Thomas Whelan, on July 13, 2008, at 10:30 a.m. On June 20,

1 [doc.no.13] was set to be heard by July 28, 2008. Plaintiff's first Motion was  
2 filed, plaintiff submitted a Request for 30-day enlargement of time and [doc.  
3 no. 15], came and plaintiff needed additional time . Plaintiff's request was  
4 Granted. Good Cause appearing.

5 On or about June 20, 2008, the Court ordered the plaintiff stating plaintiff  
6 shall file a combined response to all three motions to dismiss no later than  
7 July 28, 2008. The response should separately address the merits of each motion.

8 On June 20, 2008, plaintiff was escorted to Administrative Segregation and  
9 property was stored. Therefore, on or about July 10, 2008, plaintiff submitted  
10 a Motion requesting a 60-day enlargement of extension due to plaintiff not  
11 having access to property to address the Court and as of this here date have not  
12 received conformation as to a denial or good cause appearing for that extension.  
13 (See Copy Exhibit-A).

14 Plaintiff makes again this application for 60-day enlargement of time to file  
15 the response to answer Attorney General and District Attorney Bonnie Dumanis,  
16 San Diego Police Department, Crime Lab, and Detective J. Dreis.

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DECLARATION

1       I. Nathan Kevin Turner, declare under penalty of perjury as follows:

2       1. I am the plainiff in Pro. Se, whom will be answering and preparing to  
3 answer the Attorney General motion to dismiss petition for 42 USC §1983, which  
4 should be filed July 28, 2008. In the case of Nathan Kevin Turner v. Bonnie  
5 Dumains, et al., for the United States District Court, Southern District Civil  
6 case No. 08-cv-00360 W (RBB)

7       2. I respectfully inform the court that I will be unable to file the answer  
8 of the Attorney General Motion to Dismiss accompanying Memorandum of Points And  
9 Authroities by July 28, 2008, deadline due to plaintiff receiving his property  
10 out of storage late. Therefore, plaintiff needs a 60-day enlargement of the  
11 filing deadline up to and includeing September 26, 2008. Under final deadline  
12 pursuant to California Rule of Court, rule 8.360(c)(5)(A).

13       3. Plaintiff, who is representing himself on a Pro. Se basis, is only  
14 allowed access to the prison law library only four (4) hours per week which  
15 prevents him from completing the necessary legal research required to properly  
16 respond to defendants motions.

17       4. Attorneys response is very detailed and lengthy with many case citations  
18 that require research and reading and due to plaintiff's limited status as a  
19 layman at law inability to understand the law, a 60-day extension of time is  
20 needed and necessary to file a appropriate reply.

21       I apologize for any inconvenience that this request for enlargement of  
22 time may cause to the Court and the Court's staff. I also apologize for not  
23 presenting this request at a earlier date.

24       Dated: August 18, 2008, at Vacaville, California.

25  
26       Respectfully Submitted,  
27       /s/ *Nathan Kevin Turner*  
          Nathan Kevin Turner  
          Plaintiff In Pro. Se

EXHIBIT-A

\_\_\_\_\_

Case: 3:08-cv-00360-W-RBB Doc. No. 16-1 Date Filed: 07/10/2008

1 NATHAN KEVIN TURNER  
2 C44886  
3 P.O. BOX 2000  
3 VACAVILLE, CA 95696-2000  
4 IN PRO. PER.

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7

8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10  
11 NATHAN KEVIN TURNER  
12 Plaintiff,  
13  
14 BONNIE DUMANIS, et al.,  
15 Defendants.  
16 \_\_\_\_\_  
17

18 CIVIL NO. 08-CV-0360 W(RBB)  
19 REQUEST FOR 60 DAY ENLARGEMENT  
20 OF TIME TO RESPOND TO MOTION TO  
DISMISS [DOC. NO. 15], [DOC. NO. 10],  
[DOC. NO. 12], and [DOC. NO. 13]  
DATE: JULY 28, 2008  
DEPT: 7 - Courtroom of the  
Honorable Thomas Whelan  
TRAIL DATE: NONE

18 PLEASE TAKE NOTICE plaintiff request for 60-day enlargement of time  
19 to file the objection to defendant's motion to dismiss in [doc. No. 10],  
20 [doc. No. 12], [doc. No. 13], and [doc. No. 15]. Plaintiff received order from the  
21 Court on 7-2-08 although the office of the Clerk date is JUNE 20, 2008.

22 ON JUNE 23, 2008, which was to be heard by JUDGE WHELAN. THE COURT  
23 FINDS THAT ALL MOTIONS ARE SUITABLE FOR RESOLUTION WITHOUT ORAL  
24 ARGUMENT PURSUANT TO LOCAL RULE 7.1(a)(1), AND ACCORDINGLY THE  
25 HEARING DATES ARE VACATED. AFTER THE MOTIONS WAS FILED, PLAINTIFF  
26 SUBMITTED A REQUEST FOR 30-DAY ENLARGEMENT OF TIME [DOC. NO. 15], WHICH  
27 WAS FILED NUNC PRO TUNC TO JUNE 16, 2008, ASKING FOR ADDITIONAL TIME TO  
28 RESPOND TO DEFENDANT BROWN'S MOTION TO DISMISS. GOOD CAUSE APPEARING

1 Plaintiff REQUEST was GRANTED. The parties shall comply with the  
2 following briefing schedule relating to all pending Motions to Dismiss:  
3 (1) Turner shall file a combined response to all three Motions to  
4 Dismiss no later than July 28, 2008. The response should separately  
5 address the merits of each Motion.  
6 (2) Defendants shall file any reply briefs no later than August 11, 08  
7 The Motions will be submitted at that time and no further briefing will  
8 be accepted absent further order of the Court. IT IS SO ORDERED.  
9 DATED: JUNE 20, 2008.  
10 The Plaintiff ask this Court for an 60-day Enlargement of time  
11 there is Good cause to grant Plaintiff's request for an extension of  
12 time to file an opposition Motion to defendants Motion to Dismiss.  
13 Accordingly, Plaintiff shall have sixty days following the service  
14 of the Courts screening to file and serve defendants Motion to Dismiss in  
15 [doc. No. 10]; [doc. No. 12]; [doc. No. 13]; and [doc. No. 15]. In opposition to.  
16 On or about 6/20/2008, Plaintiff was escorted to Administrative  
17 Segregation Unit Placement (SEE Exhibit-A) As a result all Plaintiff's  
18 Personal Property has been Confiscated and stored along with his  
19 legal documents and papers.  
20 On or about 6/23/2008, Plaintiff submitted a CDCC-EA-22 request  
21 for Interviews to Prison staff Correctional Officer Elindo whom is the  
22 ad seg Property C/o assigned Post. C/o Elindo stated to Plaintiff  
23 "we are trying to locate your property." Plaintiff explained to C/o that  
24 Plaintiff has legal Court deadlines and need necessary legal  
25 document to fit full legal deadline obligations legal deadline was  
26 verified however, Plaintiff at present still sets hear in Ad seg. without his  
27 legal documents to litigate his on-going Complaints as well as to be  
28 able to file Motions in opposition to defendants Motion to dismiss.

1        on or about July 2, 2008, Prison Commitree/warden told his  
2 administration Seg unit to release Plaintiff back onto general  
3 Compound as of this here date Plaintiff still remains in ad. seg.  
4 Pending no bed available in general Compound because of overcrowd-  
5 ing. Plaintiff is still without his legal papers or personal property.

6        ON or about July 3, 2008, Plaintiff filed a prison grievance to  
7 Supervising C/Sgt. RILEY explaining the urgency of legal documents  
8 needed because of legal Court deadline and I need to answer.  
9 (See Exhibit - B).

10      Plaintiff has no other remedy available as this is procedural  
11 within ("CDCR") Policy and Procedures.

12      THESE REASONS ARE SETFORTH TO THE COURT FOR THE CONSIDERATION  
13 OF PLAINTIFF'S 60-DAY EXTENSION OF TIME TO ANSWER DEFENDANTS  
14 MOTIONS TO DISMISS [DOC. NO 10]; [DOC. NO. 12]; [DOC. NO 13] AND  
15 [DOC. NO. 15].

16      Plaintiff continues being deprived/denied access to the Courts  
17 by ("CDCR") PRISON STAFF therefore they are obstructing my access  
18 to the Court.

19      I declare, under the PENALTY of PERJURY, that the foregoing  
20 is true and correct.

21      DATED: July 10, 2008

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Respectfully Submitted,

Nathan Kevin Turner

IN PRO PER.

Case: 3:08-cv-00360-W-RBB

DATE FILED: 07/10/2008

9 I, the undersigned, hereby certify that I am over the  
10 age of eighteen years and am not a party to the above  
11 entitled action.

12 On July 10, 2008, I served a copy of  
13 A REQUEST FOR A 60-DAY ENLARGEMENT TO MOTION IN OPPOSITION TO DISMISS  
14 by placing said copy in a postage paid envelope addressed  
15 to the person(s) hereinafter listed, by depositing said  
16 envelope in the United States Mail:

17 (List all person(s) served in this action.)

18 UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

20 OFFICE OF THE CLERK  
21 880 FRONT STREET, SUITE 4290  
SAN DIEGO, CALIFORNIA 92101-8900

STATE OF CALIFORNIA  
DEPARTMENT OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL  
110 WEST A STREET, SUITE 1100  
POST OFFICE BOX 85266  
SAN DIEGO CA 92101

JOHN J. SANSONE, (State Bar No. 103060)  
1600 Pacific Highway, Room 355  
SAN DIEGO CA 92101-2469

25 I declare, under the penalty of perjury, that the  
26 foregoing is true and correct.

27 DATED: July 10, 2008

*Nathan Koenig Turner*  
Declarant's signature

28 NATHAN KEVIN TURNER  
Declarant's printed name

EXHIBIT A

STATE OF CALIFORNIA  
ADMINISTRATIVE SEGREGATION UNIT PLACEMENT NOTICE  
CDC 114-D (Rev 9/98)

DEPARTMENT OF CORRECTIONS

DISTRIBUTION: WHITE - CENTRAL FILE BLUE - INMATE (2ND COPY) GREEN - ASU	CANARY - WARDEN PINK - HEALTH CARE MGR GOLDENROD - INMATE (1ST COPY)
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INMATE'S NAME <b>TURNER, N.</b>	CDC NUMBER <b>C-44886</b>
<b>REASON(S) FOR PLACEMENT (PART A)</b>	
<input type="checkbox"/> PRESENTS AN IMMEDIATE THREAT TO THE SAFETY OF SELF OR OTHERS <input type="checkbox"/> JEOPARDIZES INTEGRITY OF AN INVESTIGATION OF ALLEGED SERIOUS MISCONDUCT OR CRIMINAL ACTIVITY <input type="checkbox"/> ENDANGERS INSTITUTION SECURITY <input type="checkbox"/> UPON RELEASE FROM SEGREGATION, NO BED AVAILABLE IN GENERAL POPULATION	

## DESCRIPTION OF CIRCUMSTANCES WHICH SUPPORT THE REASON(S) FOR PLACEMENT:

On Friday, June 20, 2008 you are being re-housed from J-350-L to W-133 on Administrative Segregation Status (ADSEG). Specifically, you refused a direct order to complete a scheduled bed change to J-270-L. You stated that you are too old and you're not moving. Based on this information, your presence on the CMF Mainline is deemed a threat to the safety and security of CMF. You will remain in ADSEG pending further administrative review and possible ICC action, to determine appropriate housing for you, based on case factor information. The attached CDCR 128C's dated June 20, 2008 reflect Psychiatric and Medical clearance for your placement in ADSEG. You are not a participant in the MHSDS. You are not a Clark participant. You are an Armstrong program participant at the DPM level. Your reading score is above 4.0 (6.0).

<input type="checkbox"/> CONTINUED ON ATTACHED PAGE (CHECK IF ADDITIONAL)	<input type="checkbox"/> IF CONFIDENTIAL INFORMATION USED, DATE OF DISCLOSURE: / /			
DATE OF ASU PLACEMENT	SEGREGATION AUTHORITY'S PRINTED NAME	SIGNATURE	TITLE	
DATE NOTICE SERVED	TIME SERVED	PRINTED NAME OF STAFF SERVING ASU PLACEMENT NOTICE	SIGNATURE	STAFF'S TITLE
INMATE REFUSED TO SIGN	INMATE SIGNATURE	CDC NUMBER		

**ADMINISTRATIVE REVIEW (PART B)**

*The following to be completed during the initial administrative review by Captain or higher by the first working day following placement*

**STAFF ASSISTANT (SA)****INVESTIGATIVE EMPLOYEE (IE)**

STAFF ASSISTANT'S NAME	TITLE	INVESTIGATIVE EMPLOYEE'S NAME	TITLE
<b>IS THIS INMATE:</b>			
LITERATE? FLUENT IN ENGLISH? ABLE TO COMPREHEND ISSUES? FREE OF MENTAL HEALTH SERVICES DELIVERY SYSTEM NEEDS? DECLINING FIRST STAFF ASSISTANT ASSIGNED?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> YES	EVIDENCE COLLECTION BY IE UNNECESSARY DECLINED ANY INVESTIGATIVE EMPLOYEE ASU PLACEMENT IS FOR DISCIPLINARY REASONS DECLINED 1ST INVESTIGATIVE EMPLOYEE ASSIGNED	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> YES
<input type="checkbox"/> NOT ASSIGNED		Any "NO" requires SA assignment	Any "NO" may require IE assignment
<input type="checkbox"/> NOT ASSIGNED			

**INMATE WAIVERS**

<input type="checkbox"/> INMATE WAIVES OR DECLINES INTERVIEW WITH ADMINISTRATIVE REVIEWER	<input type="checkbox"/> INMATE WAIVES RIGHT TO 72 HOURS PREPARATION TIME	
<input type="checkbox"/> NO WITNESSES REQUESTED BY INMATE	INMATE SIGNATURE	DATE

**WITNESSES REQUESTED FOR HEARING**

WITNESS NAME	TITLE/CDC NUMBER	WITNESS NAME	TITLE/CDC NUMBER
WITNESS NAME	TITLE/CDC NUMBER	WITNESS NAME	TITLE/CDC NUMBER

**DECISION:**  RELEASE TO UNIT/FACILITY     RETAIN PENDING ICC REVIEW     DOUBLE CELL     SINGLE CELL PENDING ICC

REASON FOR DECISION:

ADMINISTRATIVE REVIEWER'S PRINTED NAME	TITLE	DATE OF REVIEW	TIME	ADMINISTRATIVE REVIEWER'S SIGNATURE
CORRECTIONAL ADMINISTRATOR'S PRINTED NAME (if necessary)		CORRECTIONAL ADMINISTRATOR'S CO-SIGNATURE (if necessary)		DATE OF REVIEW

See Chronological Classification Review document (CDC 128-G) for specific hearing information

EXHIBIT B

CC: C/Sgt. Riley Al Seg

App. COORD

N+

**INMATE/PAROLEE  
APPEAL FORM**

CDC 602 (12/87)

Location: Institution/Parole Region

Log No.

Category

1. \_\_\_\_\_

1. \_\_\_\_\_

2. \_\_\_\_\_

2. \_\_\_\_\_

You may appeal any policy, action or decision which has a significant adverse affect upon you. With the exception of Serious CDC 115s, classification committee actions, and classification and staff representative decisions, you must first informally seek relief through discussion with the appropriate staff member, who will sign your form and state what action was taken. If you are not then satisfied, you may send your appeal with all the supporting documents and not more than one additional page of comments to the Appeals Coordinator within 15 days of the action taken. No reprisals will be taken for using the appeals procedure responsibly.

NAME	NUMBER	ASSIGNMENT	UNIT/ROOM NUMBER
TURNER, N.	C 44886	SUPERVISING C/Sgt Riley	W1-1335

THIS IS BEING UNNERVATED DUE TO MY OVERT INTEREST IN RECEIVING LEGAL DOCUMENTS/LEGAL PAPERS. APPELLANT HAS A VERIFIED LEGAL DEADLINE. IT IS

A. **Describe Problem:** UNFORTUNATE ONE HAS TO WRITE THIS GRIEVANCE BUT ITS PROCEDURAL. ON JUNE 20 2008 APP. WAS ESCORTED TO AD-SEG UNIT AND RETAINED UNTIL SEEN BY JCC COMMITTEE (COMMENCED ON 7/2/2008). HOWEVER, APP. SUBMITTED A "COURT" GA-22 TO CORRECTIONAL OFFICER COLLINDO PROPERTY STAFF EXPLAINING APP. HAS A VERIFIED LEGAL COURT DEADLINE AND NEED LEGAL DOCUMENTS. FIRST ATTEMPT WAS 6/23/2008 NO REPLY. ON 6/24/08 BEING ESCORTED TO DOCTOR CLINIC APP TOLD CLINIC I'M IN NEED OF MY LEGAL DOCUMENTS. NO REPLY ON 7-7-08 WHILE AGAIN ESCORTED TO DOCTOR CLINIC I SUBMITTED ANOTHER GA-22 REQUEST FOR INTERVIEW TO SEE COLLINDO PERTAINING APP. URGENT NEED LEGAL DOCUMENTS. COLLINDO STATED "I'LL LOOK INTO IT" THIS IS MY REASON FOR SUBMITTING THIS HERE GRIEVANCE TO ME BY THIS ON-LINE DENIAL/DEPRIVATION TO ACCESS COURTS WITHOUT NECESSARY LEGAL DOCUMENTS/ PAPERS. YOUR STAFF COLLINDO CONTINUALLY OBSTRUCTS APP HIS LEGAL RIGHT.

If you need more space, attach one additional sheet.

PLEASE TAKE NOTICE THAT APPELLANT IS BEING OVERRULED/DENIED HIS LEGAL DOCUMENTS/PAPER

B. **Action Requested:** AS HC DOES HAVE A VERIFIED COURT DEADLINE THE PRISON LAW LIBRARY HAS IT RELOCATED AND SIGNED IN ITS LOG BOOK. APPELLANT ASK ACCORDINGLY TO THE CODE REG. IN THIS (115) SECTION 3316.2(d)(2)(A) AGAIN TO THE DEPARTMENT OPERATIONS MANUAL (D.O.M) AS STATES AS FOLLOWS: OTHER LEGAL MATERIAL IN INMATE'S PERSONAL PROPERTY MAY BE ISSUED TO AN INMATE IN DISCIPLINARY DETENTION IF LITIGATION WAS IN PROGRESS BEFORE THE INMATE'S PLACEMENT IN DISCIPLINARY DETENTION AND LEGAL DUE DATES ARE IMMINENT." BE GIVEN LEGAL DOCUMENTS/MATERIALS OUT OF HIS PERSONAL PROPERTY IF NECESSARY COURTS TO LITIGATE ON-GOING COURT DEADLINE WITHOUT BEING OBSTRUCTED WITHOUT FURTHER ADD.

Inmate/Parolee Signature: TurnerDate Submitted: 7/3/2008

C. INFORMAL LEVEL (Date Received: \_\_\_\_\_)

Staff Response: \_\_\_\_\_

Staff Signature: \_\_\_\_\_

Date Returned to Inmate: \_\_\_\_\_

## D. FORMAL LEVEL

If you are dissatisfied, explain below, attach supporting documents (Completed CDC 115, Investigator's Report, Classification chrono, CDC 128, etc.) and submit to the Institution/Parole Region Appeals Coordinator for processing within 15 days of receipt of response.

Signature: \_\_\_\_\_

Date Submitted: \_\_\_\_\_

Note: Property/Funds appeals must be accompanied by a completed

CDC Appeal Number: \_\_\_\_\_

Board of Control form BC-1E, Inmate Claim

--

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF CALIFORNIA

3

4 Nathan Kevin Turner, ) CASE No. 08-cv-00360 W (RBB)  
5 )  
6 Plaintiff, ) PROOF OF SERVICE  
7 )  
8 v. )  
9 Bonnie Dumanis, et al., )  
10 )  
11 Defendants. )

12 I, the undersigned, hereby certify that I am over the  
13 age of eighteen years and am not a party to the above  
14 entitled action.

15 On July 18, 2008, I served a copy of  
16 Request for enlargement of time 60-days an inquiry to original request  
17 dated July 10, 2008. WITH EXHIBIT-A  
18 by placing said copy in a postage paid envelope addressed  
19 to the person(s) hereinafter listed, by depositing said  
20 envelope in the United States Mail:

21 (List all person(s) served in this action.)  
22 **UNITED STATES DISTRICT COURT**  
23 **SOUTHERN DISTRICT OF CALIFORNIA**

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